

EXHIBIT D

1 JENNER & BLOCK LLP
2 Reid J. Schar (*pro hac vice*)
3 RSchar@jenner.com
353 N. Clark Street
4 Chicago, IL 60654-3456
Telephone: +1 312 222 9350
Facsimile: +1 312 527 0484

5 CLARENCE DYER & COHEN LLP
6 Kate Dyer (Bar No. 171891)
7 kdyer@clarencedyer.com
899 Ellis Street
8 San Francisco, CA 94109-7807
Telephone: +1 415 749 1800
9 Facsimile: +1 415 749 1694

10 CRAVATH, SWAINE & MOORE LLP
11 Kevin J. Orsini (*pro hac vice*)
korsini@cravath.com
12 825 Eighth Avenue
New York, NY 10019
13 Telephone: +1 212 474 1000
Facsimile: +1 212 474 3700

14
15 Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

16
17 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,

20 Plaintiff,

22 v.

23 PACIFIC GAS AND ELECTRIC COMPANY,

24 Defendant.

Case No. 14-CR-00175-WHA

21 **DECLARATION OF [REDACTED]**

22 Judge: Hon. William Alsup

1 I, [REDACTED] declare as follows:

2 1. I am the Director of Vegetation Management Execution at Pacific Gas and
3 Electric Company (“PG&E”). In this role, I am responsible for overseeing the execution of all of
4 PG&E’s vegetation management programs. I have held this position since July 2019. While I
5 was not involved in vegetation management work during the post-Carr Fire restoration effort in
6 2018 and therefore do not have personal knowledge of the events described below, I understand
7 the following based on my review of relevant records.

8 2. As part of the post-Carr Fire restoration effort, PG&E contractor
9 Mountain G Enterprises, Inc. (“Mountain G”) maintained a database of information generated
10 during the post-Carr Fire vegetation management work. The database maintained by
11 Mountain G is referred to “ArcGIS”.

12 3. During the post-Carr Fire restoration effort, vegetation management
13 personnel, including pre-inspectors and Quality Control (“QC”) inspectors, uploaded information
14 to the ArcGIS database using a smartphone and computer tablet app called “Collector”.

15 4. I have reviewed reports from the ArcGIS database used to store data
16 generated during the post-Carr Fire restoration work, as well as other Mountain G records.
17 These records, and my own experience with subsequent versions of ArcGIS and Collector,
18 indicate the following:

19 a. The Collector app allowed vegetation management personnel to download
20 a map of the area which they were assigned to inspect or work each day
21 and to input data into Collector while they were out in the field.

22 b. Pre-inspectors and QC inspectors would identify trees requiring work
23 through the Collector app, which allows identification of trees for removal
24 by dropping points on a map, associating trees identified for work with
25 longitude and latitude points representing the location the inspector was
26 standing when inputting the point.

1 c. Pre-inspectors would input information about the tree, including any
2 additional location information, the tree species, and the removal class of
3 the tree based on its size.

4 d. Vegetation management personnel would upload the data through Collector
5 when they had completed their work for the day and had reliable cellular
6 service or WiFi. Uploaded data was stored in Mountain G's ArcGIS
7 database.

8 e. Mountain G would subsequently assign the work to a tree removal
9 contractor.

10 5. Mountain G's versions of ArcGIS and the Collector app do not
11 communicate with any PG&E database systems. Mountain G would send periodic reports by
12 email to PG&E personnel and other contractors working on the post-Carr Fire work (the "Carr
13 Fire Daily Reports"). The Carr Fire Daily Reports often contained a summary of the overall
14 status of the post-Carr Fire work and include spreadsheets with individual tree listings.

15 6. I have reviewed certain emails sent by Mountain G personnel attaching
16 Carr Fire Daily Reports. These records indicate the recipients typically included: (i) [REDACTED]
17 [REDACTED] a Vegetation Management Emergency Preparedness and Response Manager with
18 PG&E; (ii) [REDACTED], a Distribution Field Operations Manager with Mountain G;
19 (iii) [REDACTED], a Transmission Field Operations Manager with Mountain G; (iv) [REDACTED]
20 a Director of Vegetation Management with Clear Path Utility Solutions, LLC; and (v) [REDACTED]
21 [REDACTED], the Chief Operations Officer with Sierra Nevada Consulting, Inc.

22 7. Based on the records I reviewed, other individuals that received at least
23 one email containing a Carr Fire Daily Report were: (i) [REDACTED] a Senior Vegetation
24 Management Regional Manager with PG&E; (ii) [REDACTED], a Task Force Lead with Clear
25 Path Utility Solutions, LLC; (iii) [REDACTED] a Project Manager with Phillips and Jordan,
26 Inc.; (iv) [REDACTED] a Database Management Specialist with Davey Resource Group, Inc.;
27 (v) [REDACTED], a Project Manager with Mountain G; (vi) [REDACTED] a GIS Technician

1 with Mountain G; and (vii) [REDACTED] the Chief Executive Officer of MLU Services, Inc.
2 Selected examples of these Carr Fire Daily Reports and associated cover emails are attached
3 hereto as Exhibit 1.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 I declare under the penalty of perjury that the foregoing is true and correct and
2 that I executed this declaration on March 2, 2021 in San Ramon, California.
3 [REDACTED]
4 [REDACTED]
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1

EXHIBIT 1-A

To:

Case 3:14-cr-00175-WHA Document 1352-2 Filed 03/19/21 Page 9 of 23

Cc:

From:

Sent: Mon 8/6/2018 3:54:08 PM (UTC-07:00)

Subject: Carr Fire Status Report

Report20180806.xlsx

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Please see attached report

Thanks!

[REDACTED] GIS Database Manager

MOUNTAIN G. ENTERPRISES, INC.



EXHIBIT 1-A.1

**Native Excel File
Provided to the Court on a Hard Drive**

EXHIBIT 1-B

To:

Case 3:14-cr-00175-WHA Document 1352-2 Filed 03/19/21 Page 13 of 23

From:

Sent: Wed 9/5/2018 12:58:15 PM (UTC-07:00)

Subject: Carr Fire Daily Report

[Report20180905.xlsx](#)

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Please see attached

Thanks!

[REDACTED] GIS Database Manager

[MOUNTAIN G. ENTERPRISES, INC.](#)



EXHIBIT 1-B.1

**Native Excel File
Provided to the Court on a Hard Drive**

EXHIBIT 1-C

To:

Case 3:14-cr-00175-WHA Document 1352-2 Filed 03/19/21 Page 17 of 23

From:

Sent: Thur 10/4/2018 10:26:43 AM (UTC-07:00)

Subject: Carr Fire Daily Report

[Report20181004.xlsx](#)

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Please see attached

Thanks!

[REDACTED] | GIS Database Manager

[MOUNTAIN G. ENTERPRISES, INC.](#)



EXHIBIT 1-C.1

**Native Excel File
Provided to the Court on a Hard Drive**

EXHIBIT 1-D

To: [REDACTED] Case 3:14-cr-00175-WHA Document 1352-2 Filed 03/19/21 Page 21 of 23
From: [REDACTED]
Sent: Wed 11/7/2018 9:25:08 AM (UTC-08:00)
Subject: Carr Fire Daily Report
[Report20181107.xlsx](#)

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Please see attached

Thanks!

[REDACTED] | GIS Database Manager

MOUNTAIN G. ENTERPRISES, INC.
[REDACTED]



EXHIBIT 1-D.1

**Native Excel File
Provided to the Court on a Hard Drive**